

June 3, 2025

VIA ECF

Honorable Lee G. Dunst
United States District Court, E.D.N.Y.
100 Federal Plaza, Courtroom 830
Central Islip, New York 11722

Re: *Myers v. County of Nassau*, No. 22-cv-07023-SJB-LGD (E.D.N.Y.)

Dear Magistrate Judge Dunst:

We write to seek an amendment to the Court's June 2, 2025 order entered in response to the parties' joint status update, filed on May 30, 2025 (DE 92). In the Court's June 2 order, the Court granted Plaintiff's unopposed request to take supplemental targeted discovery during the class certification briefing period, ordering that all such discovery shall be "completed by 9/15/2025." Plaintiff's request was to be able to take supplemental targeted discovery after receipt of Defendant's opposition to Plaintiff's class certification motion, if Plaintiff has a good faith basis for seeking such discovery, such as if Defendant presents any statements, affidavits, or evidence from the five individuals newly identified in Defendant's Amended Initial Disclosures in support of its opposition to Plaintiff's class certification motion. Because Defendant's opposition to Plaintiff's class certification motion is not due until October 11, 2025, Plaintiff requests that the Court modify its order, and grant Plaintiff a 30-day period of supplemental discovery starting on October 11, 2025 and that would end on Monday, November 10, 2025. Defendant does not oppose this request.

Separately, the parties note that the date the Court set for the next status update, July 13, 2025, is a Sunday. The parties also respectfully request that the Court amend that date to Friday, July 11, 2025.

We thank the Court for its attention to this matter, and are available should the Court have any questions.

Respectfully,

/s/ Liza M. Velazquez
Liza M. Velazquez